

# **EXHIBIT E**

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**From:** Trevor Young <Trevor.Young@oag.texas.gov>  
**Sent:** Friday, February 16, 2024 12:31 PM  
**To:** Bracewell, Mollie  
**Cc:** pyetter@yettercoleman.com; MCCALLUM, Robert; TU, Xiaoxi; BAYOUMI, Jeanette; justina.sessions@freshfields.com; KAPLIN, Lauren; SALEM, Sara; Syed, Ayla; VACA, Lauren; Zeke DeRose III; Noah Heinz; James Lloyd; Geraldine W. Young; Marc B. Collier; Jonathan Wilkerson; John McBride; Luke Woodward; Cole Pritchett; Thomas Ray  
**Subject:** RE: State of Texas et al. v. Google, LLC No. 4:20-cv-957 SDJ (E.D. Tex.) -- State Plaintiffs' Fourth Amended Response to Interrogatories

**[External Email – Use Caution]**

Mollie,

Unfortunately, our 4<sup>th</sup> Am. ROG response from Wednesday evening failed to include some last minute information provided by the State of Alaska. We can discuss a reasonable time to amend to include this information in a verified response, but in the meantime, we wanted to go ahead and share that information to avoid any potential prejudice to Google, even if only a remote possibility.

ROG 3

- The Plaintiff State of Alaska specifically responds that it consulted with numerous employees from each of the thirteen Executive Branch agencies who answered and/or supplied information in response to these interrogatories. In order to avoid undue burden on State employees, Alaska is willing to meet and confer with Defendant to identify who, among the many employees consulted, Defendant believes disclosure would be of benefit.

ROG 19

- The Plaintiff State of Alaska responds that, after diligent inquiry, the AGO has determined to the best of its ability that state agencies have not independently evaluated “the impact of Header Bidding on Digital Advertising strategy or the cost effectiveness of Digital Advertising.”

ROG 21

- The Plaintiff State of Alaska responds that, after diligent inquiry, the AGO has determined to the best of its ability that state agencies have not conducted or undertaken any “studies or analyses concerning return on investment for Display Advertising, including analyses comparing the performance, value, or effectiveness of Google Ad Tech Products to other Ad Tech Products.”

Alaska is also working on providing additional information responsive to ROG 15, 18, 20, 24, and 28 in a tabular format and we will update you on the progress of those efforts in the coming weeks.

***Trevor E. D. Young***  
Deputy Division Chief  
Antitrust Division  
State of Texas, Office of the Attorney General

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**From:** Trevor Young  
**Sent:** Wednesday, February 14, 2024 11:43 PM  
**To:** Bracewell, Mollie <mbracewell@yettercoleman.com>  
**Cc:** pyetter@yettercoleman.com; MCCALLUM, Robert <rob.mccallum@freshfields.com>; TU, Xiaoxi <Xiaoxi.Tu@freshfields.com>; BAYOUMI, Jeanette <Jeanette.Bayoumi@freshfields.com>; justina.sessions@freshfields.com; KAPLIN, Lauren <lauren.kaplin@freshfields.com>; SALEM, Sara <Sara.Salem@freshfields.com>; Syed, Ayla <asyed@yettercoleman.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>; Zeke DeRose <zeke.derosé@lanierlawfirm.com>; Noah Heinz <Noah.Heinz@kellerpostman.com>; James Lloyd <James.Lloyd@oag.texas.gov>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Luke Woodward <Luke.Woodward@oag.texas.gov>; Cole Pritchett <Cole.Pritchett@oag.texas.gov>; Thomas Ray <Thomas.Ray@oag.texas.gov>  
**Subject:** State of Texas et al. v. Google, LLC No. 4:20-cv-957 SDJ (E.D. Tex.) -- State Plaintiffs' Fourth Amended Response to Interrogatories

Mollie,

As promised, and consistent with our letter on February 7, 20204, attached are State Plaintiffs' Fourth Amended Response to Google's First Set of Interrogatories.

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